

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**IN RE: STEEL ANTITRUST
LITIGATION**

Case No. 08-cv-5214

**THIS DOCUMENT RELATES TO
ALL DIRECT PURCHASER ACTIONS:**

Honorable James B. Zagel

Standard Iron Works v. ArcelorMittal, et al.,
Case No. 08-cv-5214

Wilmington Steel Processing Co., Inc. v.
ArcelorMittal, et al., Case No. 08-cv-5371

Capow, Inc. d/b/a Eastern States Steel v.
ArcelorMittal, et al., Case No. 08-cv-5633

Alco Industries, Inc. v. ArcelorMittal, et al.,
Case No. 08-cv-6197

Gulf Stream Builders Supply, Inc. v.
ArcelorMital, et al., Case No. 10-cv-4236

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENTS WITH COMMERCIAL METALS CORPORATION,
AK STEEL HOLDING CORPORATION AND GERDAU AMERISTEEL
CORPORATION, CONDITIONAL CERTIFICATION OF A SETTLEMENT
CLASS, AND APPROVAL OF NOTICES AND NOTICE PLAN**

Pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(3) and 23(e), Plaintiffs respectfully move this Court to:

1. Grant preliminary approval to the proposed settlements with Commercial Metals Corporation, AK Steel Holding Corporation and Gerdau Ameristeel Corporation;
2. Conditionally certify for settlement purposes the proposed Settlement Class;
3. Conditionally appoint Named Plaintiffs as Class Representatives, and appoint Fine,

Kaplan and Black, RPC, and Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C. as Co-Lead Class Counsel;

4. Approve the form and manner of giving notice of the proposed settlements to the Class; and

5. Set a date for a hearing on final approval of the settlements.

Plaintiffs have submitted a [Proposed] Preliminary Approval Order which is consistent with the relief requested herein.

Dated: April 3, 2014

Respectfully submitted,

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Liaison Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April, 2014, I caused a true and correct copy of the foregoing **Plaintiffs' Motion for Preliminary Approval of Settlements with Commercial Metals Corporation, AK Steel Holding Corporation and Gerdau Ameristeel Corporation, Conditional Certification of a Settlement Class, and Approval of Notices and the Notice Plan** to be filed and served electronically via the Court's CM/ECF system upon all registered users.

/s/ Jeffrey S. Istvan
Jeffrey S. Istvan